

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

Malikie Innovations Ltd. and
Key Patent Innovations Ltd.,

Plaintiff,

v.

MARA Holdings, Inc. (f/k/a Marathon Digital
Holdings, Inc.)

Defendant.

Civil Action No. 7:25-cv-00222-DC-
DTC

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant MARA Holdings, Inc. f/k/a Marathon Digital Holdings, Inc. (“MARA Holdings”), without waiving any defenses described or referred to in Federal Rule 12, hereby moves to extend the time to answer, object to, move, or otherwise respond to the Complaint for Patent Infringement (the “Complaint”) filed on May 12, 2025 (ECF No. 1) by Malikie Innovations Ltd. and Key Patent Innovations Ltd. (“Plaintiff”). The current deadline for MARA Holdings to respond to the Complaint is June 4, 2025. MARA Holdings seeks a 45-day extension up to and including July 21, 2025. In support of this request, MARA Holdings respectfully submits the following:

1. MARA Holdings requests an extension of time to respond to Plaintiff’s Complaint to permit MARA Holding’s counsel sufficient time to prepare its response to the Complaint.

2. MARA Holdings has conferred with Plaintiff, and Plaintiff does not oppose the extension sought herein.

3. MARA Holdings has requested this extension prior to the expiration of the original deadline to respond to the Complaint.

4. This motion is made in good faith and not for the purposes of undue delay. The request will not impact any other case deadlines.

In the view of the foregoing, MARA Holdings respectfully requests that the court grant this unopposed motion and extend the deadline to move, answer, or otherwise respond to the Complaint up to and including July 21, 2025.

Dated: May 27, 2025.

Respectfully submitted,

Scott Douglass & McConnico LLP
303 Colorado Street, Suite 2400
Austin, TX 78701-3234
(512) 495-6300 – Telephone
(512) 495-6399 – Facsimile

By: /s/ Steve Wingard

Steve Wingard
State Bar No. 00788694
swingard@scottdoug.com
Stephen L. Burbank
State Bar No. 24109672
sburbank@scottdoug.com
Robert P. Earle
State Bar No. 241245566
rearle@scottdoug.com

**ATTORNEYS FOR DEFENDANT MARA
HOLDINGS, INC. F/K/A MARATHON
DIGITAL HOLDINGS, INC.**

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Defendant conferred with Plaintiff's counsel and the requested relief is unopposed.

/s/ Steve Wingard

Steve Wingard

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on May 27, 2025, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Steve Wingard

Steve Wingard